

WHITE & CASE LLP

Gregory F. Pesce (admitted *pro hac vice*)
Laura Baccash (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, Illinois 60606
Telephone: (312) 881-5400
Facsimile: (312) 881-5450
Email: gregory.pesce@whitecase.com
laura.baccash@whitecase.com

WHITE & CASE LLP

Samuel P. Hershey
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
Email: sam.hershey@whitecase.com

– and –

WHITE & CASE LLP

Ronald Gorsich (*pro hac vice* pending)
555 South Flower Street, Suite 2700
Los Angeles, California 90071
Telephone: (213) 620-7700
Facsimile: (213) 452-2329
Email: rgorsich@whitecase.com

Counsel to Mohsin Y. Meghji as Litigation Administrator

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11
)
CELSIUS NETWORK LLC, <i>et al.</i> , ¹) Case No. 22-10964 (MG)
)
Debtors.) (Jointly Administered)
)

**CERTIFICATION OF NO OBJECTION REGARDING
LITIGATION ADMINISTRATOR’S MOTION TO EXTEND THE CLASS 6A
TREATMENT B AFFIRMATIVE CAUSE OF ACTION DEADLINE UNDER THE PLAN**

The undersigned counsel to Mohsin Y. Meghji (the “**Litigation Administrator**”) hereby
certifies that:

1. On July 11, 2024, the Litigation Administrator filed the *Litigation Administrator’s*

¹ The “**Post-Effective Date Debtors**” in these chapter 11 cases, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of the Post-Effective Date Debtor Celsius Network LLC’s principal place of business and the Post-Effective Date Debtors’ service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

Motion to Extend the Class 6A Treatment B Affirmative Cause of Action Deadline Under the Plan
[Docket No. 7245] (the “**Motion**”).

2. Pursuant to the Motion and the *Second Amended Final Order (I) Establishing Certain Notice, Case Management, and Administrative Procedures and (II) Granting Related Relief* [Docket No. 2560] (the “**Case Management Order**”), objections to the final relief requested in the Motion were due July 22, 2024, at 4:00 p.m. prevailing Eastern Time (the “**Objection Deadline**”).

3. Rule 9075-2 of the Local Bankruptcy Rules provides that a motion may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline and (b) counsel for the entity that filed the motion files a statement certifying that counsel has reviewed the docket not less than forty-eight hours after the Objection Deadline and no objection, responsive pleading, or request for hearing with respect to such motion appears thereon.

4. As of the filing of this certificate of no objection, more than forty-eight hours have elapsed since the Objection Deadline, and, to the best of the undersigned counsel’s knowledge, no objection, responsive pleading, or request for hearing with respect to the Motion has been (a) filed with the Court on the docket of the above-captioned chapter 11 cases or (b) served on the Litigation Administrator or his counsel.

5. Accordingly, the Litigation Administrator respectfully requests entry of the proposed order attached hereto as **Exhibit A**.

[Remainder of page intentionally left blank]

Dated: July 24, 2024
New York, New York

Respectfully submitted,

/s/ Gregory F. Pesce

WHITE & CASE LLP

Gregory F. Pesce (admitted *pro hac vice*)
Laura Baccash (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, Illinois 60606
Telephone: (312) 881-5400
Facsimile: (312) 881-5450
Email: gregory.pesce@whitecase.com
laura.baccash@whitecase.com

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Telephone: (213) 620-7700
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1221 Avenue of the Americas
New York, New York 10020
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*Counsel to Mohsin Y. Meghji
as Litigation Administrator*

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11
)
CELSIUS NETWORK LLC, <i>et al.</i> , ¹) Case No. 22-10964 (MG)
)
Post-Effective Date Debtors.) (Jointly Administered)
)

**ORDER GRANTING LITIGATION ADMINISTRATOR’S
MOTION TO EXTEND THE CLASS 6A TREATMENT B
AFFIRMATIVE CAUSE OF ACTION DEADLINE UNDER THE PLAN**

Upon the motion [Docket No. 7245] (the “**Motion**”)² of the Litigation Administrator for entry of an order (this “**Order**”) (a) extending the July 29, 2024 deadline by which the Litigation Administrator must bring any Avoidance Action or other claim against any Holder of an Allowed General Custody Claim (Class 6A) that elected, through their ballot, Treatment B under the Plan (the “**Class 6A Treatment B Affirmative Cause of Action Deadline**”) by 180 days, to and including January 25, 2025, without prejudice to the Litigation Administrator’s right to seek further extensions, and (b) granting such other relief as is just and proper, all as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the Southern District of New York, entered February 1, 2012; and the Motion and relief requested being a core proceeding under 28 U.S.C. § 157(b)(2); and this Court having

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

found that venue of these cases in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and this Court having found that the relief requested in the Motion is in the best interests of the Post-Effective Date Debtors' Estates, the Post-Effective Date Debtors' creditors, and other parties in interest; and this Court having found that the Litigation Administrator's notice of the Motion and opportunity for a hearing thereon were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The Motion is **GRANTED** as set forth herein.
2. The Class 6A Treatment B Affirmative Cause of Action Deadline is extended to and including January 25, 2025.
3. Entry of this Order is without prejudice to the Litigation Administrator's right to seek a further extension(s) of the Class 6A Treatment B Affirmative Cause of Action Deadline.
4. The requirements of Local Bankruptcy Rule 9006-2 shall be deemed satisfied.
5. Notice of the Motion shall be deemed good and sufficient, and the applicable requirements of the Bankruptcy Rules and Local Bankruptcy Rules have been satisfied.
6. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2024
New York, New York

MARTIN GLENN
Chief United States Bankruptcy Judge